

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)|
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER & BENVENUTTI LLP

Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

*Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**NOTICE OF FILING OF REVISED
PROPOSED ORDER APPROVING
DE MINIMIS CLAIMS SETTLEMENT
PROCEDURES MOTION**

Re: Dkt. No. 3576
Date: September 11, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas and
2 Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-
3 captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title 11 of the
4 United States Code with the United States Bankruptcy Court for the Northern District of California
5 (San Francisco Division) (the “**Bankruptcy Court**”).

6 **PLEASE TAKE FURTHER NOTICE** that on August 16, 2019, the Debtors filed the *Motion*
7 *of Debtors Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 for Authority to*
8 *Establish Procedures to Settle and Compromise Certain Claims and Causes of Action* [Docket No. 3576]
9 (the “**Motion**”). A hearing on the Motion is scheduled to be held on **September 11, 2019, at 9:30 a.m.**
10 **(Pacific Time)** (the “**Omnibus Hearing**”) at the Bankruptcy Court in the courtroom of the Honorable
11 Dennis Montali, United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden Gate Avenue,
12 San Francisco, California 94102.

13 **PLEASE TAKE FURTHER NOTICE** that a proposed form of order with respect to the relief
14 sought therein was attached as Exhibit A to the Motion (the “**Original Proposed Order**”).

15 **PLEASE TAKE FURTHER NOTICE** that on September 3, 2019, the Public Advocates
16 Office of the California Public Utilities Commission (“**Cal PA**”) timely filed a limited objection to the
17 Motion [Docket No. 3797].

18 **PLEASE TAKE FURTHER NOTICE** that on September 6, 2019, the Bankruptcy Court
19 issued a tentative ruling on the Motion [Docket No. 3836] (the “**Tentative Ruling**”) in which the
20 Court stated that if the Debtors agreed with the Court’s Tentative Ruling they should revise the
21 Original Proposed Order to be consistent with the Tentative Ruling, obtain approval of Cal PA to the
22 revised form of order, and submit the revised order to the Court for approval, at which time, the
23 Motion would be dropped from the Omnibus Hearing.

24 **PLEASE TAKE FURTHER NOTICE** that, attached hereto as **Exhibit 1-1** and **Exhibit 1-2**,
25 respectively, are copies of the Debtors’ revised proposed order on the Motion (the “**Revised Proposed**
26 **Order**”) and a redline comparison of the Revised Proposed Order against the Original Proposed Order.
27 The Revised Proposed Order incorporates changes that are consistent with the Tentative Ruling, which
28 have been approved by Cal PA, as well as additional informal comments and revisions from various
29 parties, including the Creditors Committee, the Tort Claimants Committee, the California Attorney
30 General’s Office, and certain insurers. Consistent with the Tentative Ruling, the Debtors have,
31 contemporaneously hereto, submitted the Revised Proposed Order to the Bankruptcy Court for
32 approval.

33 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings and other documents
34 identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at
35 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
36 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime
37 Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
38 U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
39 40 Bankruptcy Court’s website.

41 ////

1 Dated: September 9, 2019

2 **WEIL, GOTSHAL & MANGES LLP**
3 **KELLER & BENVENUTTI LLP**

4 /s/ Jane Kim

5 Jane Kim

6 *Attorneys for Debtors and Debtors in Possession*
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28